

EXHIBIT G

CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 230

CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 232

19 Q. Now, what people did you talk with at
20 Syngenta concerning the budgeting process?
21 A. So I spoke to the people who we've
22 mentioned before such as --
23 Q. Mr. Cecil?
24 A. Mr. Cecil.
25 Q. Mr. Fisher?

CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 233

1 A. Mr. Fisher.
2 Q. Dr. Wichert?
3 A. Dr. Wichert, Dr. Whitton. I also spoke
4 to Victoria Bublyk who is the controller as well
5 as other people in the accounting group.
6 Q. And is the substance of what they told
7 you accurately summarized at Pages 29 and 30 of
8 your report?
9 A. So that Pages 29 and 30 are a synthesis
10 of my conversations with them. So they said
11 other things, too, but I synthesized it down to
12 this.
13 Q. About how long did you discuss their
14 budgeting process with them, about how many --
15 how much time did you spend in those
16 discussions?
17 A. Well, first, it's hard to say because
18 we would have long conversations about topics
19 which would discuss budgets for a portion and
20 then go on to other topics so it's hard for me
21 to quantify. There was not a "we're only
22 talking about budgeting from this time to this
23 time."
24 Q. As you sit here today and you look at
25 Pages 29 to 30, is there anything else they told

CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 234

1 you about their budgeting process that you
2 regard as important to your determination that
3 their budgeting process could be used in this
4 case, anything other than what appears in 29 and
5 30?
6 A. As I sit here today, I believe that
7 everything of great import is here. There are
8 other facts that I determined that I learned
9 from that and which might be relevant if a
10 certain topic gets raised by you, Mr. Jarosz or
11 someone else, but in overall generalities, I am
12 comfortable with Pages 29 and 30.

CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 290

CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 292

:

4 Q. Is it your understanding that one
5 cannot commercially make azoxystrobin without
6 practicing the '761 patent?
7 A. It is my understanding that there are
8 other methods, for instance, the methods that
9 Syngenta used prior to the '761 patent, that one
10 could physically manufacture the product.
11 Q. And, in fact, if I heard you correctly,
12 it's your understanding that Syngenta used the
13 '138 method, the patent taught in the '138
14 method, for a period of time before the '761
15 method became available?
16 A. Yes, I do.
17 Q. Do you know when Syngenta stopped --
18 switched from the '138 to the '761?
19 A. Well, I think they still practice the
20 '138 patent.
21 Q. I'm talking about using the additional
22 technology taught in the '761.
23 A. I do not know the date of the switch.

CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 293

[REDACTED]